

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

JENNIFER PARKER

VS.

WAL-MART STORES TEXAS, L.L.C.

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CIVIL ACTION NO: 14-00072

PLAINTIFF'S FIRST SUPPLEMENTAL INITIAL DISCLOSURES

TO: Defendant, Wal-Mart Stores of Texas, LLC, by and through its attorney of record,
John Ramirez, Bush & Ramirez, 24 Greenway Plaza, Suite 1700, Houston,
Texas 77046

COMES NOW, JOLENE ABSHER, Plaintiff in the above-styled and numbered
cause of action and pursuant to Fed. R. Civ. P. 26(a)(1), files the following Initial
Disclosures:

- A) The name, and if known, the address and telephone number of each individual
likely to have discoverable information relevant to disputed facts alleged with
particularity in the pleadings, identifying the subjects of the information:

Jennifer Parker
c/o Jeffrey N. Todd
THE LAW FIRM OF ALTON C. TODD
312 S. Friendswood Drive
Friendswood, Texas 77546
Plaintiff

Wal-Mart Stores Texas, L.L.C.
c/o John Ramirez
Bush & Ramirez
24 Greenway Plaza, Suite 1700
Houston, Texas 77046
Defendant

**Plaintiff's medical providers and their custodians' of records for medical and billing
records:**

Dr. Kevin Varner
Methodist Orthopedics
Attn: Medical & Billing Records
6550 Fannin Suite 2600
Houston, Texas 77030

**Dr. David Loncarich
Fondren Orthopedics
Attn: Medical & Billing Records
7401 Main Street
Houston, Texas 77030**

**Dr. David Bloome
Fondren Orthopedics
Attn: Medical & Billing Records
7401 Main Street
Houston, Texas 77030**

**St. John's Hospital
Attn: Medical & Billing Records
18300 St. John Drive
Houston, Texas 77058**

**One Step Diagnostic
2401 FM 646 Road West Suite B
Dickinson, Texas 77539**

**Mainland Hospital
Attn: Medical & Billing Records
6801 Emmett F. Lowry Expressway
Texas City, Texas 77591**

**UTMB Galveston
301 University
Galveston, Texas 77555**

**St. John's Sports Medicine
Attn: Medical & Billing Records
18100 St. John Drive Suite 100
Houston, Texas 77058**

**Ergo Rehab
Attn: Medical & Billing Records
10737 Gulf Freeway
Houston, Texas 77034**

**Dr. Jerome Carter
Attn: Medical & Billing Records
4201 Garth Road Suite 212
Baytown, Texas 77521**

**Dr. Benoy Benny
The Spine Sports Center
Attn: Medical & Billing Records
2100 West Loop South Suite 150
Houston, Texas 77027**

- B) A copy of, or a description by category and location of, all documents, data compilations, and tangible things in the possession, custody or control of the party that are relevant to disputed facts alleged with particularity in the pleadings:

See attached the following medical and billing records:

Document:	Type (Medical/Billing)	Bates No.'s
One Step Diagnostic	Medical	0339-0340
One Step Diagnostic	Billing	0341

- (C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered:

See (B) above.

- (D) For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment:

None.

Respectfully submitted,

By: /s/ Jeffrey N. Todd

Jeffrey N. Todd
State Bar No. 24028048
Federal ID No. 1308

ATTORNEYS IN CHARGE FOR PLAINTIFF

OF COUNSEL:
THE LAW FIRM OF ALTON C. TODD
312 S. Friendswood Drive
Friendswood, Texas 77546
(281) 992-8633
(281) 648-8633 Facsimile No.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded to all known counsel of record and other entities and individuals as reflected below, on this the 9TH day of June 2014 via the method(s) indicated:

John A. Ramirez
BUSH & RAMIREZ
24 Greenway Plaza, Suite 1700
Houston, Texas 77046

Via E-File and Facsimile

/s/ Jeffrey N. Todd

Jeffrey N. Todd